

interpretation or situation in which the ambient pressure and the bore pressure is capable of and will move the depending portion into the bore to thereby attach the first component to the second component when the depending portion is partially attached . . . .” (Final Office Action, paragraph 3).

However, applicant respectfully submits that the Examiner’s interpretation of Blair is incorrect. First, Blair clearly states that his debris cap is installable without any special tools (col. 1, lines 48-54). Therefore, Blair does not disclose any means for creating a pressure differential between the tree bore and the ambient environment. Without such means, Blair cannot create a pressure differential that will move the depending portion of the first component into the bore.

Second, Blair’s debris cap is specifically designed to prevent the creation of a pressure differential between the tree bore and the ambient environment. This is evident from the fact that Blair provides his debris cap with inlet and outlet valves 30, 32 to allow the seawater to be displaced as the cap is removed from or installed on the tree (col. 2, lines 12-16). Therefore, as Blair’s debris cap is installed on the tree, the pressure within the tree bore will be the same as (or slightly greater due to the restricted size of the outlet valve 32) ambient pressure.

Third, the “suction effect” to which the Examiner apparently refers in support of his position plays no role in moving the debris cap into the tree bore. As is clearly understood by persons of ordinary skill in the art, the suction effect exists only after the debris cap is fully seated on the tree. In this position, the pressure within the bore of the tree is the same as the ambient pressure.

However, any attempt to remove the debris cap at this point will tend to increase the volume and thereby decrease the pressure within the tree bore, and this decrease in pressure within the tree bore will tend retain the debris cap in place on the tree.

Moreover, independent claims 14 and 32 are separately patentable over Blair. Each of these claims requires "means for removing at least a portion of the fluid from the bore." This "means" corresponds to the vacuum pump 128, which is described beginning on page 11, line 17 of the application. Blair clearly does not disclose such structure. To the contrary, as noted above, Blair's debris cap is installable without any special tools.

Therefore, claims 1, 14 and 32 are not anticipated by Blair. Furthermore, since claims 4-8, 14, 16-20, 27, 34-38 and 45 depend from claims 1, 14 and 32, these claims cannot be anticipated by Blair.

In light of the foregoing, claims 1-49 are submitted as allowable.

Favorable action is solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Henry C. Query, Jr.', with a stylized flourish at the end.

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